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PLEASE REPLY TO: PHILADELPHIA OFFICE

July 1, 2021

***Filed via ECF***

The Honorable Edward G. Smith  
U.S. District Judge  
101 Larry Holmes Drive  
4th Floor  
Easton, PA 18042

**RE: *U.S. v. Christopher Stimpson***  
**No.: 20-413**

Dear Judge Smith:

As the Court is aware, this office represents the above Defendant. Pretrial Motions in this matter are due on or before July 7, 2021 as per the Court's Order (Doc. 36) dated April 2, 2021. Jury selection is scheduled for October 15, 2021 and trial for October 18, 2021.

This letter is to respectfully request an **Extension of Time to file Pretrial Motions**. This request is unopposed by the Government. By June 12, 2021, it became apparent to within Counsel that Search Warrants were used to access Mr. Stimpson's Instagram Accounts which were not provided in discovery. On that date, this office emailed the Government requesting copies of the Search Warrants. I was informed that they were under seal and that I would be provided the same. On June 29, 2021, I received six (6) Search Warrant cover sheets. The Affidavits of Probable Cause and Attachments to the Warrants, however, were missing and have not been provided to date. As a result, I am unable to file complete Pretrial Motions without this additional discovery.

Additionally, this letter is to inform the Court that I have a multi-defendant, 3-4 week criminal jury trial scheduled in the EDPA on October 4, 2021 before the Honorable Chief Judge Juan R. Sanchez in the matter of *U.S. v. Jovon Covington*, et al. No.: 19-636. This case was indicted in 2019. As a result, if this matter begins when scheduled, I will be unable to try our matter on October 15, 2021. The co-defendant's attorney, Christian J. Hoey, Esquire, previously represented to the Court that he would be unavailable for trial due to a previously scheduled jury trial in the Philadelphia Court of Common Pleas – Civil Division.

Thank you for your time and consideration.

Respectfully submitted,



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MICHAEL N. HUFF, ESQUIRE

MNH/mh

cc: All Counsel via ECF